

EXHIBIT B

1 degradation in this analysis.

2 BY MR. DAVIS:

3 Q. Have you considered any of Ethicon's
4 biocompatibility risk assessments?

5 A. Yes. I've looked at their
6 biocompatibility testing. I've looked at a lot of
7 their testing. I'm telling you they did not
8 consider oxidative degradation in this risk
9 analysis. And that's clearly evident by the
10 listing of questions that I provided in my report.

11 Q. Do you know who Thomas Barbolt is?

12 A. Yes. I've heard his name.

13 Q. I mean, I saw his name listed at the
14 very end of your report, among a lot of other
15 names.

16 A. Yes.

17 Q. Your report on the second-to-last page
18 says that you were supplied a number of
19 depositions, correct?

20 A. Yes. Some time ago, yes.

21 Q. Did you read any of those depositions
22 in connection with your preparation of your current
23 report?

24 A. At some point I have.

25 Q. Well, which ones did --